

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

GILDA HAGAN-BROWN

Plaintiff,

v.

ELI LILLY AND COMPANY, an Indiana  
corporation,

Defendant.

CASE NO.: 1:14-CV-01614

JANINE ALI

Plaintiff,

v.

ELI LILLY AND COMPANY, an Indiana  
corporation,

Defendant.

CASE NO.: 1:14-CV-01615

**MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY**

For the reasons set forth in the accompanying Memorandum, which is incorporated by reference herein, Plaintiffs Janine Ali and Gilda Hagan-Brown, and Defendant Eli Lilly and Company, respectfully jointly move this Court for a fourteen (14) day extension of time, pursuant to Local Civil Rule 37, in which to complete discovery. The parties waive a hearing on this Motion.

Respectfully submitted,

/s/ Peter A. Miller

Peter A. Miller (47822)  
MILLER LEGAL LLC  
175 S. Pantops Drive, Third Floor  
Charlottesville, VA 22911  
Tel: (434) 529-6909  
Fax: (888) 830-1488  
pmiller@millerlegalllc.com  
bhunt@millerlegalllc.com

R. Brent Wisner, Esq. (*pro hac vice*)  
BAUM, HEDLUND, ARISTEI &  
GOLDMAN, P.C.  
12100 Wilshire Blvd., Suite 950  
Los Angeles, CA 90025  
Tel: (310) 207-3233  
Fax: (310) 820-7444  
rbwisner@baumhedlundlaw.com

*Counsel for Plaintiffs*

/s/ Jeffrey Todd Bozman

Jeffrey Todd Bozman (83679)  
Michael X. Imbroscio (*pro hac vice*)  
Phyllis A. Jones (*pro hac vice*)  
Brett C. Reynolds (*pro hac vice*)  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street, N.W.  
Washington, DC 20001  
Tel: (202) 662-5335  
Fax: (202) 778-5335  
jbozman@cov.com

*Counsel for Defendant Eli Lilly & Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of April, 2015, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Peter A. Miller  
Brielle Marie Hunt  
MILLER LEGAL LLC  
175 S. Pantops Drive, Third Floor  
Charlottesville, VA 22911  
Tel: (434) 529-6909  
Fax: (888) 830-1488  
pmiller@millerlegalllc.com  
bhunt@millerlegalllc.com

R. Brent Wisner, Esq. (*pro hac vice*)  
BAUM, HEDLUND, ARISTEI & GOLDMAN, P.C.  
12100 Wilshire Blvd., Suite 950  
Los Angeles, CA 90025  
Tel: (310) 207-3233  
Fax: (310) 820-7444  
rbwisner@baumhedlundlaw.com

*Counsel for Plaintiffs*

Dated: April 29, 2015

By: \_\_\_\_\_/s/  
Jeffrey T. Bozman (83679)  
Covington & Burling LLP  
One CityCenter  
850 Tenth Street, N.W.  
Washington, DC 20001  
Tel: (202) 662-5829  
Fax: (202) 778-5829  
jbozman@cov.com  
*Counsel for Eli Lilly and Company*